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Attorneys for Defendants Rimini Street, Inc., and Seth Ravin

1	UNITED STATES DISTRICT COURT				
2	DISTRICT OF NEVADA				
3					
4		SA, INC., a Colorado corporation;	Case No. 2:10-cv-0106-LRH-PAL		
5	ORACLE AMERICA, INC., A Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,		STIPULATION AND [PROPOSED] ORDER TO VACATE THE JUNE 12, 2012 CMC AND TO MODIFY THE		
6					
7	v.	Plaintiffs,	CASE SCHEDULE		
8	RIMINI STREET, INC., a Nevada corporation; AND SETH RAVIN, an individual,		Courtroom: 3B Judge: Magistrate Peggy A. Leen		
10		Defendants.			
11					
12	Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.				
13	(collectively, "Oracle" or "Plaintiffs") and Defendants Rimini Street, Inc. ("Rimini Street") and				
14	Seth Ravin ("Ravin") (together, "Rimini" or "Defendants") stipulate as follows and request that				
15	the Court enter the [Proposed] Order set forth below.				
16	A.	A. Rimini Street's expert reports, served on March 30, 2012, and depositions of two			
17	of Rimini Street's experts, Scott Hampton (on May 25) and Brooks Hilliard (on June 5) showed				
18	that Rimini's experts have relied on opinions supplied by Rimini Street employee Jim Benge.				
19	B. On June 6, the parties agreed that Rimini Street would make Mr. Benge available				
20	for a three-hour deposition.				
21	C. The deadline for expert discovery is June 15. The parties have already completed				
22	five expert depositions, and two additional expert depositions are scheduled to take place on or				
23	before that date.				
24	D.	The parties respectfully request that	the Court permit the deposition of Mr. Benge		
25	to take place after the expert discovery deadline. This would not affect any other deadlines in the				
26	case.				
27	E.	E. Because the parties have no disputes requiring the Court's attention at this time,			
28	the parties request that the Court continue the Case Management Conference, currently				
		1			

1	scheduled for June 12, until July 24, or such other date as is convenient for the Court.					
2						
3	SO STIPULATED AND AGREED.					
4	Dated: June 8, 2012					
5						
6	SHOOK, HARDY & BACON LLP	BOIES, SCHILLER & FLEXNER LLP				
7	By: /s/ Robert H. Reckers	By: /s/ Kieran Ringgenberg				
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10	Attorneys for Defendants	Attorneys for Plaintiffs				
11	and the same of th	<u> </u>				
12	Pursuant to stipulation, it is hereby ORDERED that:					
13	1. Oracle may take the deposition of Rimini Street employee Jim Benge following					
14	the close of expert discovery on June 15, 2012.					
15						
16	C	currently scheduled for June 12, 2012 is				
17	vacated and rescheduled for	, 2012 at in Courtroom 3B.				
18						
19						
20		Hon. Peggy A. Leen United States Magistrate Judge				
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1	ATTESTATION OF FILER				
2	The signatories to this document are Robert Reckers and me, and I have obtained Mr.				
3	Reckers's concurrence to file this document on his behalf.				
4					
5	Dated: June 8, 2012		BOIES, SCHILLER & FLEXNER LLP		
6		By:	/s/ Kieran Ringgenberg		
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